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VIA FEDERAL EXPRESS NO. 809044476118

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

99-00648

Re: IntraLATA Toll Dialing Parity Plan of the Electric Power
Board of Chattanooga

Dear David:

In response to the Authority's notice dated April 5, 1999, the Electric Power Board of Chattanooga ("EPB") by submittal dated April 21, 1999, requested permission to delay filing its Toll Dialing Parity Plan advising the Authority that the EPB was in the process of constructing its facility based network and anticipated offering switch telecommunications services during the first quarter of 2000. The EPB paid its filing fee at that time.

The EPB now anticipates launching service on a resale basis in November of 1999 in advance of completing its facility based network.

Accordingly, the EPB has prepared its IntraLATA Toll Dialing Parity Plan, original and thirteen copies of which are enclosed for filing.

Please contact us if there are any questions regarding this matter.

Sincerely yours,



William C. Carriger
For the Firm

WCC/tm
Enclosures

REC'D IN
REGULATORY DIV.
SEP 3 PM 11 37
EXECUTIVE SECRETARY

INTRALATA TOLL
DIALING PARITY PLAN

99-00648

ELECTRIC POWER BOARD OF CHATTANOOGA

I. OBJECTIVE/PURPOSE

In Compliance with the Federal Communications Commission ("FCC") rules delineated in 47 C.F.R. Sections 51.207 through 51.215, EPB of Chattanooga ("the Company") files its plan for implementing intraLATA toll dialing parity ("the Plan").

The intent of the Plan is to permit customers to select and subsequently to route intraLATA toll calls automatically, without the use of access codes, to the interexchange carriers ("LXC") that have established themselves as Access Customers of the Company ("Participating Carrier").

This Plan will be effective in all exchanges for which the Company will provide local exchange service. The Company will associate with the 472 Chattanooga LATA. The Company will comply with all pertinent Federal Communication Commission and Tennessee Regulatory Authority Rules and Regulations regarding the Company's provision of intraLATA toll dialing parity.

II. IMPLEMENTATION SCHEDULE

The Company intends to offer dialing parity for intraLATA calls upon its implementation of local exchange service, which is planned for introduction or about November 1, 1999.

III. CARRIER SELECTION PROCEDURES

The Company will implement the "2-PIC" (Presubscribed Interexchange Carrier) methodology. With the "2-PIC" methodology, customers will be able to subscribe to one Participating Carrier for their intraLATA toll calls and to subscribe to the same or a different Participating Carrier for their intraLATA toll calls.

Company employee's who communicate with the public, accept service orders and serve in customer service capacities will be trained to explain the availability of "2-PIC" Equal Access, and to assist customers in making an initial PIC selection.

IV. CALLS SUBJECT TO INTRALATA TOLL DIALING PARITY

Interstate intraLATA 1+ and 0+ toll calls originating in an exchange shall be subject to intraLATA toll dialing parity provisions.

V. CUSTOMER ELIGIBLE FOR INTRALATA TOLL DIALING PARITY

All end user customers subscribing to the Company's local exchange service offerings shall be eligible for intraLATA dialing parity.

VI. CARRIER NOTIFICATION

An IXC that desires to become a Participating Carrier shall notify the Company by requesting and completing the Carrier Participation Form. The request for this Form may be made by telephone or e-mail to the designated Company carrier relations contact. Once the Carrier Participation Form has been returned to the Company and an Access Service Request has been processed, that carrier will be added to the alphabetical list of Participating Carriers maintained by the Company.

VII. CUSTOMER EDUCATION and NOTIFICATION

Customers will receive information explaining their opportunity to select an intraLATA toll service provider upon placing an order for local exchange service with the Company. The Company anticipates that promotional strategies by intraLATA toll service providers will contribute to Customer awareness of intraLATA toll dialing parity.

VIII. CUSTOMER SELECTION PROCESS

Customers contacting the Company requesting local exchange service will be informed of the opportunity to select both an intraLATA and interLATA PIC at no charge. If requested by the customer, the Company will provide an alphabetical list of Participating Carriers. Customers who do not make an affirmative selection of an intraLATA toll service provider will be identified in the Company records as a "no-PIC" and will not be defaulted to a toll service provider. New customers identified in the Company records as a "no-PIC" will be required to dial the access code 101XXXX where XXXX represents the identification code of the carrier they desire to use. The use of the access code will be required for placement of each intraLATA toll call until they make an affirmative selection. The Company representatives will not discuss alternative carriers' rates or services. Instead, carrier contact telephone numbers will be provided to the Company's end users seeking information regarding carrier calling plans.

A customer's request to change his/her current intraLATA PIC will be accepted and processed by the Company in accordance with FCC PIC change procedures. The customer will incur a non-recurring PIC Change Charge of \$5.00. This charge will be tarified prior to implementation.

Customers will be given a period of six (6) months after intraLATA subscription service becomes available within which to make one change of their preferred carrier at no cost to the customer. This waiver period will begin on November 1, 1999. After the initial six (6) months, the Company may charge customers the intraLATA PIC Change Charge at tarified

rates. An initial application of "no-PIC" will, for purposes of applying the PIC Change Charge, be viewed as an affirmative PIC selection.

The Company has no existing customers.

Prior to implementing local exchange service the Company will adopt an anti-slamming policy. The Company is familiar with Tennessee Regulatory Authority Rule 1220-4-2-.56 related to slamming.

IX. ACCESS to OPERATOR SERVICES and DIRECTORY ASSISTANCE

Access to Operator Services and Directory Assistance will be available through the Customer's local exchange service provider or intraLATA toll service provider. No industry standard has been established for access to Operator Services and Directory Assistance unique to the intraLATA toll service provider. For Operator Services, Customers dial "0" to reach their local exchange operator and "00" to reach their intraLATA operator. For Directory Assistance, Customers dial "1-411" in the Company's service territory for accessing the local exchange Directory Assistance and Customers dial "1-NPA-555-1212" for accessing their intraLATA toll service provider's Directory Assistance.

The local and intraLATA Operator Service and Directory Assistance may be branded by the local and intraLATA service providers, as appropriate, based on the dialing pattern of the Customer. Since no unique intraLATA dialing pattern currently exist in the industry, the Company is not capable of identifying intraLATA calls to the Company's or the intraLATA toll service providers operators or directory assistance representatives. As such, this procedure is considered in compliance with FCC Order No. 96-333, Rule 51-217(d).

X. COST RECOVERY

The Company does not currently plan to recoup the incremental cost of implementing intraLATA toll dialing parity but reserves the right to do so in the future. Should the Company make such a determination, it will provide advance notice to the Authority.

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